



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

(217) 524-6308

CERTIFIED MAIL # 7019 1120 0001 3037 9134
RETURN RECEIPT REQUESTED

September 30, 2020

Commonfields of Cahokia Sewer District
2525 Mousette Lane
East St. Louis, IL 62206
Attn.: Dennis Traiteur, Manager

Re: Violation Notice: Commonfields of Cahokia Sewer District
Violation Notice No.: W-2020-50179

Dear Facility Owner:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachments A and B include explanations of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
2009 Mall Street Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

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Violation Notice No.: W-2020-50179

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Water Pollution Control
Attn: Cathy Siders / CAS#19
P.O. BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, **W-2020-50179**.

Questions regarding this Violation Notice should be directed to **Cathy Siders at 217/524-6308** or catherine.siders@illinois.gov.

Sincerely,



Cathy Siders, Manager
Compliance Assurance Section
Division of Water Pollution Control
Bureau of Water

Attachments: A & B

ATTACHMENT A

Violation Notice: Commonfields of Cahokia Sewer District
Violation Notice No.: W-2020-50179

Questions regarding the violations identified in this attachment should be referred to **Cathy Siders** at **(217) 524-6308**.

On August 5, August 26, and September 9, 2020; collection system, CMOM and MS4 inspections were conducted by representatives of the Illinois EPA for the Commonfields of Cahokia and the City of Centreville collection systems, lift stations, etc. During these inspections the following significant issues were observed; deteriorated conditions of the concrete sewer mains, severe infiltration and inflow (I & I), inoperable lift stations, and sanitary sewer overflows (SSO) occurring from a sewer lateral cleanout at 219 N. 82nd Street.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

Overflows from Sanitary Sewers are Expressly Prohibited

Determine the cause of the overflows and investigate corrective actions to eliminate the possibility of any further raw sewage discharges. Submit a detailed response including a timetable for each corrective measure proposed. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020 Rule/Reg.:	Overflow of sanitary sewers Section 12(a) of the Act, 415 ILCS 5/12(a) (2018); 35 Ill. Adm. Code 306.304

Systems Reliability

Review the operational and maintenance procedures in order to correct the deficiencies which caused the violations. Compliance with this requirement is expected to be achieved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	All treatment works and associated facilities shall be so constructed and operated as to minimize violations of applicable standards during such contingencies as flooding, adverse weather, power failure, equipment failure, or maintenance, through such measures as multiple units, holding tanks, duplicate power sources, or such other measures as may be appropriate.

Rule/Reg.: Section 12(a) of the Act, 415 ILCS 5/12(a) (2018);
35 Ill. Adm. Code 306.102(a)

Excess Infiltration

Review the operational and maintenance procedures in order to correct the deficiencies which caused the violations. Compliance with this requirement is expected to be achieved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	Excess infiltration into sewers shall be eliminated, and the maximum practicable flow shall be conveyed to the treatment facility
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2018); 35 Ill. Adm. Code 306.303

Discharge of Contaminants

Cease and desist from discharging contaminants that cause or threaten to cause water pollution. Review operational and maintenance procedures and correct the deficiencies which caused the violation. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	No person shall cause, threaten or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2018)

Deposited Contaminants

Cease and desist from depositing contaminants that cause or threaten to cause water pollution. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	Deposited contaminants on the ground in such a manner that caused or threatened to cause a water pollution hazard.
Rule/Reg.:	Section 12(a) and (d) of the Act, 415 ILCS 5/12(a) and (d) (2018)

Offensive Conditions

Review and evaluate operational procedures in order to correct the deficiencies which caused the violations. Discharges must not cause a violation of water quality standards. Compliance is expected to be achieved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	Waters of the State shall be free from sludge or bottom deposits, floating debris, visible oil, odor, plant, oil, odor, plant or algal growth, color or turbidity of other than natural origin.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2018), 35 Ill. Adm. Code 302.203

Offensive Discharge

Review and evaluate the operational procedures in order to correct the deficiencies which caused the violations. Discharges must not cause a violation of water quality standards. Compliance is expected immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	No effluent shall contain settleable solids, floating debris, visible oil, grease, scum or sludge solids. Color, odor and turbidity must be reduced to below obvious levels.
Rule/Reg.:	Section 12(a) and (d) of the Act, 415 ILCS 5/12(a) and (d) (2018), 35 Ill. Adm. Code 304.106

ATTACHMENT B

Violation Notice: Commonfields of Cahokia Sewer District

Violation Notice No.: W-2020-50179

In order to assist your facility in attaining compliance with the apparent violations listed in Attachment A, the following recommendations are offered:

1. Immediately cease all overflows from your sanitary sewer collection system. At the time of the investigation, there was sanitary sewer overflow (SSO) occurring from a lateral cleanout at 219 North 82nd Street.
2. Repair or replace all nonfunctioning pumps within the lift station located near the intersections of North 82nd Street and Bluff Street.
3. Provide an automatic float system within the lift station located near the intersections of North 82nd Street and Bluff Street.
4. Repair or replace the electronic controls for the lift station located near the intersections of North 82nd Street and Bluff Street. These controls were in poor condition and appear to have reached the end of their design life.
5. Televis the section of sewer main from the lift station located near the intersections of North 82nd Street & Bluff Street and the cleanout SSO, which is approximately 670 feet southwest of the station.
6. Based upon the television data, repair or replace the collapsed section(s) of sewer main from the lift station located near the intersections of North 82nd Street & Bluff Street and the lateral cleanout SSO.
7. Immediately initiate efforts to reduce inflow and infiltration into your wastewater collection system to minimize operation and maintenance problems during periods of significant rainfall. These efforts should include smoke testing of the sewer mains tributary to the North 82nd Street and Bellevue Street lift station.
8. Based upon the smoke testing data, conduct point repairs and sewer main replacement of the sewer collection system tributary to the Bellevue lift station.
9. Provide sealed manhole lids or elevate manholes in low lying areas to minimize stormwater inflow into the sewer collection system.

WASTEWATER DISTRIBUTION LISTFacility Name: Commonfields of CahokiaWW VN #: W-2020-50179Letter Type: VNReviewed/Approved Initial Date WWCMU Staff:
WWCMU Supervisor SUMMARY OF CONTACTS MADE IN COORDINATION OF CONCURRENCE OF LETTER:FOS personnel contacted: Jim Miles/Dan Shiteley
DLC personnel contacted: Mike Roubitchek
Permits personnel contacted:
Other contact: Sanjay Sapat & Todd PettigDate of contact: 9/29 & 30/2020
Date of contact:
Date of contact:
Date of contact: OUTGOING CORRESPONDENCE: (VNs, Proposed CCAs, Acceptance/Rejection/Meeting Letters, etc.)Bcc: ☒ WW VN File ☐ Cathy Siders ☐ Greg Spencer ☐ Caleb Ruyle ☐ Roger Callaway
☐ Jay Patel ☐ Jim MilesRegional Offices:☐ Rockford (Region 1) ☐ Des Plaines (Region 2) ☐ Peoria (Region 3) ☐ Champaign (Region 4) ☐ Springfield (Region 5) ☒ Collinsville (Region 6) ☐ Marion (Region 7)Field Contact: Division of Legal Counsel:☐ Christine Zeivel ☐ Chuck Gunnarson ☐ DLC
☐ Jacob Smith ☒ Mike Roubitchek ☐ Other:☐ Tom Reuter (Records Unit) ☐ Sharon Dowson (FOIA)ADMINISTRATIVE:New File Needed: ☒ Yes ☐ NoHas correspondence been scanned and sent to project manager? ☐ Yes ☐ NoComments:

 Administrative Support Initials: SODate: 10/1/2020